

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA

V.

1:17cr00224-AT-CMS

ALLAN PENDERGRASS

MOTION FOR ADDITIONAL TIME TO FILE MOTIONS AND CONTINUE  
PRETRIAL CONFERENCE

Comes now the Defendant, by and through counsel and asks for an additional ten days to file any motions in this matter for the reasons enumerated below:

1.

Counsel only recently received discovery in this matter, (as well as the omnipresent password). This is a complex white collar matter.

2.

Assistant United States Attorney Jeff Brown graciously does not oppose this relief.

WHEREFORE, Defendant prays;

1. That he receive such additional time to file these motions that are presently due , and be given an additional ten days be given to file said motions, and that the pretrial conference be reset to a more appropriate date based on said additional time, and further that t he pretrial conference be scheduled at a later time as well;
2. That the hearing on August 9, 2017 remain in effect as to the issue of bond, which should be a

consent matter, and

3.. That any such period of time be excluded under the Speedy Trial Act as such would be necessary in the interests of justice, and

3. For such other relief that this Court deems appropriate.

Respectfully submitted,

S/Robert H. Citronberg

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Robert H. Citronberg  
Attorney for Defendant  
State Bar #126275

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303 Peachtree Street,  
Atlanta, Ga. 30308  
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CERTIFICATE OF SERVICE

It is hereby certified that the foregoing motion was served electronically on:

Mr. Jeff Brown  
Assistant United States Attorney  
Richard B. Russell Courthouse  
75 Spring St., SW  
Atlanta, Ga. 30303.

This 8th day of August, 2017

S/Robert H. Citronberg

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Robert H. Citronberg  
Attorney for Defendant Pendergrass (Court  
Appointed)

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